

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ORIGINAL

----- X
UNITED STATES OF AMERICA :
:
- v. - : INFORMATION
KUN SHAN CHUN, :
a/k/a "Joey Chun," :
:
Defendant. :
----- X

16 CRIM 518

COUNT ONE

The United States Attorney charges:

1. From in or about 2011, up to and including on or about March 16, 2016, in the Southern District of New York and elsewhere, KUN SHAN CHUN, a/k/a "Joey Chun," the defendant, not being a diplomatic or consular officer or attaché, did knowingly act in the United States as an agent of a foreign government without prior notification to the Attorney General, as required by law, to wit, while acting in the United States at the direction of one or more officials of the People's Republic of China, and during the course of CHUN's employment at the Federal Bureau of Investigation ("FBI"), CHUN collected sensitive

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JUDGE MARRERO

information from the FBI for transmittal to one or more Chinese government officials without previously notifying the Attorney General.

(Title 18, United States Code, Section 951.)

Preet Bharara
PREET BHARARA
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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- v. -

KUN SHAN CHUN,
a/k/a "Joey Chun,"

Defendant.

INFORMATION

16 Cr.

(18 U.S.C. § 951.)

PREET BHARARA
United States Attorney.

8/1/16 - Filed Information
Re Filed Waiver of Indictment
J Francis
USM